

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

In re:	:	Chapter 7
	:	
WORLEY & OBETZ, INC., <i>et al.</i> , ¹	:	Case No. 18-13774 (REF)
	:	(Jointly Administered)
Debtors.	:	
	:	

**LIMITED OBJECTION TO MOTION OF LUCKNOW-HIGHSPIRE TERMINALS LLC
FOR ALLOWANCE OF ADMINISTRATIVE EXPENSE
CLAIMS UNDER 11 U.S.C. § 503(B)(9)**

Christine C. Shubert (the “Trustee”), the Chapter 7 Trustee for the estates of Worley & Obetz, Inc., *et al.* (the “Debtors”), by and through her counsel Fox Rothschild LLP, respectfully submits this limited objection (the “Limited Objection”) to the Motion of Lucknow-Highspire Terminals LLC for Allowance of Administrative Expense Claims (the “Administrative Expense Claims”) Under 11 U.S.C. § 503(B)(9) (the “Motion”) [D.I. 120]. In support of this Limited Objection, the Trustee states as follow:

1. On June 6, 2018 (the “Petition Date”), the Debtors each filed a voluntary petition for relief under chapter 7 of the Bankruptcy Code in the United States Bankruptcy Court for the Eastern District of Pennsylvania.

2. The Trustee has determined that Debtors Worley and Obetz, Inc. and Amerigreen Energy, Inc. each received the petroleum related products set forth in the Motion within twenty (20) days prior to the Petition Date.

¹ The Debtors in these cases, along with the last four digits of their federal tax identification numbers are (i) Worley & Obetz, Inc. (6576) (Case No. 18-13774-REF); (ii) Americomfort, Inc. (7605) (Case No. 18-13775-REF); (iii) Ranck Plumbing Heating & Air Conditioning, Inc. (9625) (Case No. 18-13776-REF); (iv) Amerigreen Energy, Inc. (6284) (Case No. 18-13777-REF); (v) Advance Air, Inc. (8111) (Case No. 18-13778-REF); (vi) Amerigreen Energy Brokers, LLC (2358) (Case No. 18-13779-REF); (vii) Amerigreen Electricity, LLC (8977) (Case No. 18-13780-REF); (viii) Amerigreen Hedging Services, LLC (8549) (Case No. 18-13781-REF); (ix) Amerigreen Lubricants, LLC (7489) (Case No. 18-13782-REF); (x) Amerigreen Natural Gas, LLC (3222) (Case No. 18-13783-REF); and (xi) Amerigreen Propane, LLC (Case No. 18-13784-REF).

3. However, given the early stage of this case, the Trustee should not be required to pay any administrative claims immediately.

4. The Trustee therefore requests that any Order granting the Motion expressly provide that the Administrative Expense Claims will not be paid immediately.

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Dated: July 12, 2018